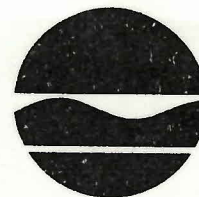


M. Informa

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233



Thomas C. Jorling
Commissioner

June 16, 1993

CA93-06/16/93

Mr. William E. Kochem, Jr.
Supervisor, Plant Engineering
Inland Fisher Guide Division
General Motors Corporation
1000 Town Line Road
Syracuse, NY 13221

Dear Mr. Kochem:

Re: Surface Impoundment Post-Closure
Ground Water Monitoring Plan
and O&M Inspection on June 29th
NYD002239440

The New York State Department of Environmental Conservation has received your May 24, 1993 letter regarding section 4.03 of the above-referenced Plan. The Department accepts your letter as a formal amendment to the Plan. The letter has been attached to the Department's copy of the Plan (dated April 1988, revised November 1992).

Effective immediately, Ms. Luanne Whitbeck is no longer assigned to your facility. William Wertz, Ph.D. will now be your Department geological contact. In order to familiarize Dr. Wertz with your site, Ms. Whitbeck will accompany him to your facility on June 29, 1993 to observe your quarterly sampling event. Ms. Whitbeck has been in contact with Mr. John Tomik of O'Brien & Gere to arrange this visit.

An Operations & Maintenance Inspection, as required by the USEPA, will be performed at that time. The Inspection will involve observing the actual sampling event, and reviewing the RCRA groundwater files kept at your facility. The Department will not be splitting samples with you during this Inspection.

In the future, Region 7 is to be copied on all correspondence sent to the Albany Office. Please send the copies to Mr. Steve Eidt, P.E., Regional Hazardous Substance Engineer, Division of Hazardous Substances Regulation, 615 Erie Boulevard West, Syracuse, NY 13204-2400.

Please call Dr. Wertz at 518-457-9255 if you should have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul R. Counterman", with a stylized flourish at the end.

Paul R. Counterman, P.E.
Director
Bureau of Western Hazardous
Waste Programs
Division of Hazardous Substances
Regulation

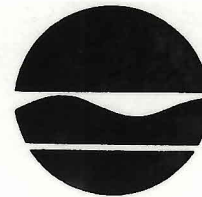
cc: L. Whitbeck
W. Wertz
S. Eidt, R-7

bcc: E. Miles
J. Desai
M. Infurna, USEPA R-II

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

MAK 11 1993

ENVIRONMENTAL PROTECTION
AGENCY REGION II
93 MAR 13 AM 1:00
AWM-HAZ WASTE FAC. BRANCH



Thomas C. Jorling
Commissioner

William E. Kochem, Jr.
Supervisor, Plant Engineering
Inland Fisher Guide Division
General Motors Corporation
P.O. Box 4869
Syracuse, New York 13221-4869

NYD 002239440
CA 93-05/11/93

Dear Mr. Kochem:

Re: 1992 Annual Groundwater Report

The New York State Department of Environmental Conservation has received the above-referenced Report, dated February 1993.

A review of this report indicates that it contains all the necessary elements required in 6NYCRR Part 373-3.6(e). The QA/QC for the data is being reviewed separately. You will be contacted if any questions arise.

If you have any questions, please call me at (518) 457-7264.

Sincerely,

Luanne F. Whitbeck

Luanne F. Whitbeck, C.P.G.
Supervisor, Region 2 Section
Bureau of Eastern Hazardous
Waste Programs
Division of Hazardous Substances
Regulations

cc: E. Miles
P. Patel
S. Eidt, Region 7
J. Desai
A. Bellina, USEPA Region II
G. Meyer, USEPA Region II
M. Infurna, USEPA Region II ✓

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

ENVIRONMENTAL
AGENCY

February 24, 1993

AWM-HAZ WASTE

Thomas C. Jorling
Commissioner

Mr. William E. Kochem, Jr.
Supervisor, Plant Engineering
Inland Fisher Guide Division
General Motors Corporation
1000 Town Line Road
Syracuse, NY 13221

CA 93-02/24/93

Dear Mr. Kochem:

Re: 1991 Annual Groundwater Quality
Assessment - NYD002239440

The New York State Department of Environmental Conservation has received Inland Fisher Guide's response to Department comments on the 1991 Annual Groundwater Quality Assessment Report.

This submission has resolved all issues except for the following:

1. Please provide the complete analytical data package, field logs, groundwater elevation measurements, equipotential maps, data interpretations, etc. with the quarterly reports. The annual report can be brief, including summary tables of the data and the groundwater elevation measurements, an interpretation of the groundwater elevation measurements and the rate and extent of contamination as measured. That way, if any issues come up regarding the quarterly data or the sampling event, they can be dealt with quickly.
2. As discussed in your November 13, 1992 letter, the Department agrees that performing the statistical analyses as required by the regulations is not useful at this time in light of the presence of historical contamination unrelated to the surface impoundments. It is understood that the entire area will be remediated as one unit; therefore, until notified in writing to the contrary, IFG may discontinue performing the statistical analyses on the data from the surface impoundments. IFG must continue to evaluate the groundwater data and present a discussion of groundwater quality trends in the quarterly and annual reports.

3. On Figures 2, 3, and 5, the locations of MW-3D and MW-3S have not been corrected as agreed to in your October 6, 1992 letter. In the future, please be sure to use the updated base map to avoid confusion.

It is the Department's understanding that IFG had agreed at the October 21, 1992 meeting to perform a one-time analysis of the groundwater for dioxins. Although dioxins were not required as part of the soil sampling program during closure of the impoundments, they may not be dropped from the Appendix 33 groundwater analyses without written Department approval. Failure of the Department to note this omission during previous report reviews is not justification for IFG's continuing failure to comply with the approved Sampling and Analysis Plan. It appears from your November 13, 1992 letter, 3.03 Appendix IX Analysis, comment on paragraph 1 that this sampling has not been performed as agreed to. IFG is, therefore, directed to sample the RCRA compliance monitoring wells for dioxins during the next scheduled sampling event. Failure to do so will result in enforcement action by the Department. Please notify the Department at least ten business days prior to the scheduled sampling event so a representative can be present to split samples.

The QA/QC portions of your Annual Report are being reviewed separately. Should any questions arise concerning the data, you will be contacted.

It is not necessary to resubmit this Annual Report; these changes have been noted in our copy. Please utilize these comments for future reports. If you have any questions, please contact me at (518) 457-7264.

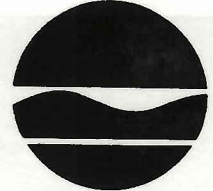
Sincerely,

Luanne F. Whitbeck

Luanne F. Whitbeck, C.P.G.
Supervisor, Region 2 Section
Bureau of Eastern Hazardous
Waste Programs
Division of Hazardous Substances
Regulations

cc: P. Patel
E. Miles
P. Counterman
S. Eidt, Region 7
J. Desai
M. Infurna✓

M. Infurna



Thomas C. Jorling
Commissioner

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

REC'D NOV 0 11

NOV - 4 1992

CA 92 - 11/04/92

Mr. William E. Kochem, Jr.
Supervisor, Plant Engineering
Inland Fisher Guide Division
General Motors Corporation
1000 Town Line Road
Syracuse, NY 13221

Dear Mr. Kochem:

Re: Operations & Maintenance Inspection Report
NYD002239440

The New York State Department of Environmental Conservation has received the revised site map indicating the correct locations for RCRA monitoring wells MW-3S and MW-3D. This revised map fulfills the requirements of my September 14, 1992 letter.

If you have any questions, please contact Ms. Luanne F. Whitbeck at (518) 457-7264.

Sincerely,

Paul R. Counterman, P.E.
Director
Bureau of Western Hazardous
Waste Programs
Division of Hazardous Substances
Regulation

cc: L. Whitbeck
P. Patel
S. Eidt, Region 7
J. Desai
M. Infurna

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

ENVIRONMENTAL PROTECTION
92 OCT 13 PM 12:55
AWM-HAZ WASTE FAC. BRANCH

Thomas C. Jorling
Commissioner

MEMORANDUM

CA 92 - 10/07/92

TO: Steve Eidt, RHSE

FROM: Luanne Whitbeck, Chief, Facility Compliance Region 2 *LW*
Bureau of Eastern Regions Hazardous Waste

RE: GMC Inland Fisher Guide NYD002239440

DATE: October 7, 1992

As we discussed in today's telephone conversation, the following are the violations I have noted for the above-referenced facility. If your regional attorney chooses to pursue a multi-media Order-on-Consent these violations should be included.

The following violations were noted during the review GMC Inland Fisher Guide Division's (IFG) 1991 Annual Groundwater Report. IFG is maintaining an alternate groundwater monitoring system as provided for under 6NYCRR 373-3.6(a)(4) because of statistically significant increases of site-specific parameters downgradient as compared to upgradient. The facility submitted a Sampling and Analysis Plan, which was approved by the Department, and subsequently amended several times.

The following violations were noted during the review:

1. IFG has failed to determine the extent of migration of the hazardous waste or hazardous waste constituents in the groundwater as provided for in 373-3.6(d)(4)(iv)(a).

IFG had statistically significant increases for total chromium, total nickel and total zinc in monitoring well MW-5S (downgradient) as compared to the upgradient wells for December of 1991 and has not proposed any additional work. Therefore, the extent of contamination (the plume boundary) has not been determined.

2. IFG has failed to determine the concentrations of the hazardous waste or hazardous waste constituents in the groundwater as provided for in 373-3.6(d)(4)(iv)(b).

Steve Eidt
Page 2
October 7, 1992

For the August 1991 and the December 1991 groundwater sampling events, the incorrect detection limit was used in the analysis for lead after being advised in writing, and agreeing, that the correct detection limit would be used. Attached are the Department's April 16, 1991 letter, IFG's May 15, 1991 response, and the Department's May 28, 1991 letter confirming this. These letters state the correct analytical method and detection limit to be used by IFG. The detection limit actually used was twice the groundwater standard - ten times the specified detection limit. IFG, therefore, has not determined the concentration of hazardous waste constituents in the groundwater. The problem of appropriate detection limits has been an ongoing issue. Because IFG did not use the appropriate detection limits, there may have been other statistically significant increases, but this cannot be confirmed due to the lack of information and, therefore, precludes further violations.

IFG is not cooperating with the Central Office in its attempts to bring them into compliance with the regulations. The Central Office has written several letters (two are attached regarding lead) regarding the various deficiencies in the groundwater Sampling and Analysis Plan. These Sampling and Analysis Plan deficiencies are not included in this referral (but are attached), because the violations are not as clearly defined as 6NYCRR Part 373-3 violations. Any complaint issued against the facility should be accompanied by the maximum fine possible.

If you have any questions regarding this referral, please contact me at 518-457-7264.

attachments

cc: E. Miles
S. Kaminski
J. Desai
J. Petiet
P. Patel
M. Infurna, EPA R-2

October 7, 1992

The following are violations of GMC Inland Fisher Guide Division's approved (Interim Status) Sampling and Analysis Plan:

1. Total well depths were not measured immediately prior to sampling.
2. DNAPL was found in MW-2S on 9/25/91 and was not sampled and analyzed for volatiles, semi-volatiles and PCBs.
3. Incorrect detection limits were used in all wells for total chromium and nickel on 7/21/89, 8/24/89, 9/23/89, 10/24/89, 11/22/89, 12/11/89, 3/5/90, 5/15/90, 8/23/90, and 12/14/90. Incorrect detection limits were used for lead in all wells on 7/21/89, 8/24/89, 9/23/89, 10/24/89, 12/11/89, 3/5/90, 8/23/90, and 12/14/90. Incorrect detection limits were used for lead in some wells on 5/15/90, 9/25/91 and 12/20/91.
4. Appendix IX analyses were run on MW-2D and MW-4S on 12/12/91 instead of MW-2S and MW-4D. IFG stated on 2/27/92 that MW-2S had been sampled and the data would be forwarded. To date, the Department has not received this data.
5. In the Appendix IX sampling on 12/12/91, IFG failed to sample for dioxins, herbicides, and pesticides. No explanation was provided.

IFG had many deficiencies in their 1990 Annual Groundwater Report. The Central Office commented and IFG responded adequately to all issues. IFG had many of the same deficiencies in their 1992 Annual Groundwater Report. While these are deficiencies, they are not clear violations of any regulation or approved work plan.

Syracuse Plant

**INLAND
FISHER GUIDE**



PEL: 92-139

September 17, 1992

92 SEP 25 PM 1:45

PLANT ADMINISTRATION
BRANCH

NYD 002 239 440

CA 92-09/17/92

Mr. Leland Flocke
Regional Director
New York State Department
of Environmental Conservation
Region #7
615 Erie Boulevard West
Syracuse, NY 13204-2400

Re: NYS DEC vs. General Motors Corporation
Inland Fisher Guide Division
Syracuse Plant
Case R-7-002-85-05

Dear Sir:

Enclosed please find the Quarterly Well Monitoring Report
Exhibit A, Compliance Schedule, No. 1, for the 3rd Quarter
of 1992.

If you have any questions, please contact Linda G. Yaus at
315-432-5112, or William E. Kochem Jr. at 315-432-5314 of my
staff.

Very truly yours,

INLAND FISHER GUIDE DIVISION
General Motors Corporation
Syracuse Plant

Michael K Stout

Michael K. Stout
Plant Manager

ms

cc: William F. McCarthy, NYSDEC
Robert L. Burdick, Onondaga County Dept. of Health
U.S. Environmental Protection Agency

[illegible]

BIWEEKLY WELL MONITORING - SOLVENT CONSENT ORDER

#R7-0002-85-05

PARAMETERS	WELL T-1	T-2	T-3	T-4	T-5	T-6	T-7	T-8	T-9	UNITS	T-10	BLANK	
SET 156 7-8-92										ug/L			
TOTAL XYLENES	<345.	151000.	164000.	101000.	4220.	<15.	<15.	<15.	Na		<15.	<15.	
TOLUENE	<10.	<2500.	<6250.	<2500.	<50.	<5.0	<5.0	<5.0	Na		<5.0	<5.0	
ETHYLBENZENE	60.	27000.	26300.	20200.	1700.	<5.0	<5.0	<5.0	Na		<5.0	<5.0	
TOTAL	<	<	<	<	<	<25.	<25.	<25.	Na		<25.	<25.	
PARAMETER	WELL T-1	T-2	T-3	T-4	T-5	T-6	T-7	T-8	T-9		T-10	BLANK	
SET 157 7-21-92													
TOTAL XYLENES	529.	104000.	115000.	75800.	44400.	<15.	<15.	Na	Na		Na	<15.	
TOLUENE	<10.	<2500.	<2500.	<2500.	<100.	<5.0	<5.0	Na	Na		Na	<5.0	
ETHYLBENZENE	80.	12800.	16500.	13700.	2880.	<5.0	<5.0	Na	Na		Na	<5.0	
TOTAL	<	<	<	<	<	<25.	<25.	Na	Na		Na	<25.	

#R7-0002-85-05

#R7-0002-85-05												
PARAMETERS	WELL T-1	T-2	T-3	T-4	T-5	T-6	T-7	T-8	T-9	UNITS	T-10	BLANK
SET 158 8-11-92										ug/L		
TOTAL XYLENES	472.	116000.	107000.	63900.	6390.	<15.0	<15.0	<15.0	<15.0		<15.0	<15.0
TOLUENE	<5.0	460.	2060.	776.	33.5	<5.0	<5.0	<5.0	<5.0		<5.0	<5.0
ETHYLBENZENE	69.5	14100.	14700.	10900.	2180	<5.0	<5.0	<5.0	<5.0		<5.0	<5.0
TOTAL	<546.5	130560	123760.	75576.	8603.5	<25.	<25.	<25.	<25.		<25.	<25.
PARAMETER	WELL T-1	T-2	T-3	T-4	T-5	T-6	T-7	T-8	T-9		T-10	BLANK
SET 159 8-19-92												
TOTAL XYLENES	<550	82,100										
TOLUENE	<10	<2000										
ETHYLBENZENE	58	14,400										
TOTAL	<618	<98,500	<109,100	<92,400	<9,810	<25	<25	<25	<25		N2	<25